

UNITED STATES COPYRIGHT ROYALTY JUDGES

THE LIBRARY OF CONGRESS

IN THE MATTER OF:

DETERMINATION OF ROYALTY RATES AND TERMS FOR
MAKING AND DISTRIBUTING PHONORECORDS
(*PHONORECORDS IV*)

DOCKET NO.

21-CRB-0001-PR (2023-2027)

MUSIC PUBLISHERS ASSOCIATION OF THE UNITED STATES
COMMENTS IN SUPPORT OF
PROPOSED REGULATIONS SETTING RATES AND TERMS FOR SUBPARTS A, C, AND D

The Music Publishers Association of the United States (MPA) submits the following comments in support of the adoption of the Copyright Royalty Judges' proposed regulations setting rates and terms for Subparts A, C, and D.

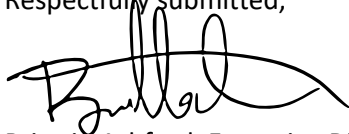
The Music Publishers Association, founded in 1895, is one of the oldest music service organizations in the United States. The MPA was founded to educate and support our members, which include music publishers of all styles and genres, including by advocating for effective copyright and other intellectual property laws to help ensure appropriate compensation for the use of America's music. We fully believe that the proposed regulations serve the goals of our organization and its members.

While the MPA supports the rates set forth in the proposed regulations, we believe that they could do more to reflect what the fair value should be for the use of copyright owners' works by DSPs; the increase to the Percent of Service Provider Revenue over time is a critical step towards providing copyright owners with equitable compensation for their work.

We also believe that these proposed increases to the alternate rate structures are a reasonable step forward in the relationship between copyright owners and the DSPs and will ultimately benefit the songwriters who are the foundation of America's musical ecosystem.

Songwriters and composers are in great need of higher mechanical royalty rates that fully reflect their immense contributions to our society and our economy. Music is one of America's largest and most culturally-significant exports. We need to support its creators so that they may continue to thrive and produce work that brings joy to so many throughout the world. We strongly urge the Judges to adopt streaming rates that better reflect what music creators and those who stream their compositions would negotiate in a free market.

Respectfully submitted,



Brittain Ashford, Executive Director
Music Publishers Association of the United States